

EXHIBIT A

LAW OFFICES OF ERIC A. SHORE

Toni L. Telles, Esquire

Attorney ID: 003552009

4 Echelon Plaza

201 Laurel Rd., 8th Floor

Voorhees, New Jersey 08043

(856) 433-6228

Attorney for Plaintiff, Adam Williams

ADAM WILLIAMS Plaintiff v. TESLA, INC; TESLA MOTORS, INC.; TESLA, INC. d/b/a TESLA MOTORS, INC.; and JOHN DOES 1-5 and 6-10 Defendants.	SUPERIOR COURT OF NEW JERSEY BURLINGTON COUNTY LAW DIVISION Civil Action DOCKET NUMBER BUR-L- _____
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COMPLAINT and JURY DEMAND

Plaintiff, Adam Williams, residing in the town of Lumberton, Burlington County, New Jersey, by way of Complaint against the defendants, says:

Preliminary Statement

This case is brought under the Conscientious Employee Protection Act ("CEPA"), which prohibits retaliation and/or discharge of an employee for engaging in certain protected conduct.

Identification of Parties

1. Plaintiff, Adam Williams, is a resident of the State of New Jersey and was, at all relevant times herein, an employee of Defendant.

2. Defendants, Tesla Inc., Tesla Motors, Inc. and Tesla Inc. d/b/a Tesla Motors, Inc. were, at all relevant times herein, the employers of Plaintiff, jointly and severally, maintaining a principal place of business in Palo Alto, California.

3. Defendants John Does 1-5 and 6 -10 are individuals and/or entities who, on the basis of *respondeat superior* or on the basis of their own acts, are liable to the Plaintiff for the reasons set forth in this Complaint.

General Allegations

4. Mr. Williams was employed by Defendants since approximately September 2011 and most recently held the position of mobile manager.

5. At all relevant times herein, Mr. Williams had been performing his job duties up to the legitimate expectations of his employer.

6. During the course of Mr. Williams' employment with Defendants, he became aware of Defendants' practice of failing to disclose to consumers high-dollar, pre-delivery damage repairs prior to any transaction with consumers.

7. Mr. Williams reasonably believed this practice to be illegal and/or fraudulent.

8. Mr. Williams reported on several occasions throughout his employment to Matt Farrell, his supervisor, and Jerome Guillen, a vice president employed by Defendants, that Defendants had failed to disclose this information to consumers and that this was illegal and/or fraudulent.

9. In doing so, Mr. Williams engaged in protected conduct under CEPA.

10. Additionally, Mr. Williams was aware of a practice of Defendants involving receiving vehicles designated as "lemons" and, with this knowledge, reselling these vehicles

without branding the titles of these vehicles or offering disclosure, rather representing the cars as “used” or a “demo/loaner.”

11. Mr. Williams reasonably believed this practice to be illegal and/or fraudulent.

12. Mr. Williams reported to Mr. Farrell, in approximately the winter of 2016 and/or early 2017, that this practice was illegal.

13. Mr. Williams also reported this practice to Lenny Peake, the East Coast Regional Manager, during this time.

14. In doing so, Mr. Williams engaged in protected conduct under CEPA.

15. Despite the fact that Mr. Williams reported this illegal and/or fraudulent conduct to upper management, Defendants continued this practice throughout Mr. Williams’ employment.

16. Mr. Williams continued to object to and/or report to management that this practice was illegal.

17. At the time of Mr. Williams’ protected conduct, both Matt Farrell and Lenny Peake reported directly to Brian Applegate, a director employed with Defendants.

18. In approximately early 2017, Mr. Williams was demoted by Mr. Applegate, a Director employed by Defendant, who told Mr. Williams that Mr. Williams has a “brand” at the company and that there was no place for Mr. Williams in “My new Tesla.”

19. Mr. Williams was demoted from Regional manager to the Service Manager of the Springfield, New Jersey Tesla location.

20. In approximately July 2017, Mr. Williams was again demoted to a Mobile Manager position, despite the fact that he was performing his job duties up to the legitimate expectations of Defendants.

21. In approximately September 2017, Mr. Williams was terminated by Regional Manager, Albert Grice.

22. Mr. Grice informed Mr. Williams that the decision to terminate him was made by Mr. Applegate.

23. Defendants stated reason for Mr. Williams' termination was performance, despite the fact that Mr. Williams had been performing his duties in this role up to the legitimate expectations of his employer.

24. Defendants offered reason for Mr. Williams' termination is pretext.

COUNT I
CEPA

25. Plaintiff hereby repeats and re-alleges the preceding and succeeding paragraphs 1 through 24 as though fully set forth herein.

26. Plaintiff disclosed to a supervisor the practices of Defendants that he reasonably believed to be illegal and/or fraudulent.

27. Plaintiff thereby engaged in "protected conduct" as that phrase is understood within the meaning of CEPA.

28. Plaintiff subsequently suffered termination of his employment after engaging in protected conduct.

29. There exists a causal connection between the Plaintiff's protected activity and his termination.

WHEREFORE, Plaintiff demands judgment against the Defendants, jointly and/or severally and in the alternative, together with economic compensatory damages, non-economic compensatory damages, consequential damages, punitive damages, costs of suit, attorney's fees

and enhancements, interest, equitable front pay, equitable back pay, equitable reinstatement, and any other relief the court deems equitable and just.

COUNT II
EQUITABLE RELIEF

30. Plaintiff hereby repeats and realleges the preceding and succeeding paragraphs as though fully set forth herein.

31. Plaintiff requests this Court declare the practices stated herein to be a violation of CEPA.

32. Plaintiff requests equitable reinstatement, with equitable back pay, equitable front pay and all benefits received by Plaintiff as a result of his employment equitably restored.

33. Plaintiff requests Defendants purge their files of any reference to Plaintiff's termination which this Court finds in violation of CEPA.

34. Plaintiff requests any other equitable relief this Court deems reasonable and just.

WHEREFORE, Plaintiff demands judgment against the Defendants, jointly and/or severally and in the alternative, together with economic compensatory damages, non-economic compensatory damages, consequential damages, punitive damages, costs of suit, attorney's fees and enhancements, interest, equitable front pay, equitable back pay, equitable reinstatement, and any other relief the court deems equitable and just.

DEMAND TO PRESERVE EVIDENCE

Defendants are hereby directed to preserve any and all physical, electronic and/or digital information or data pertaining in any way to Plaintiff's employment, to Plaintiff's allegations, causes of action or defense to Plaintiff's allegations or causes of action as well as any and all evidence pertaining to any party or employee of any party, including but not limited to physical, electronic and/or digital data (electronically stored information), web pages, social media

profiles, pages or identities, emails, voice messages, text messages, instant messages or messaging systems, recordings, digital recordings, media images and videos, temporary memory, memory sticks, portable memory devices, laptops or computers, CDs, DVDs, USB devices, databases, computer activity logs, internet browsing history (including cookies), network access and server activity logs, word processing files and file fragments, back-up and archival files, imaging and facsimile files, electronic calendar and scheduling program files and file fragments as well as any other contact and relationship management data (e.g., Outlook, ACT!), electronic spreadsheet files and file fragments, related to this matter. This includes a request that such information not be modified, altered or deleted as a result of data compression or disk fragmentation (or other optimizations procedures), which processes you are hereby directed to suspend until such time as that data can be preserved, copied and produced.

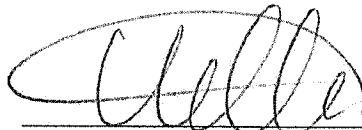
In terms of paper information, Defendants are directed to preserve any and all contracts and contract drafts, emails, memos and drafts of memos, handbooks (past and present), policies (past and present) and drafts, employment files, pay stubs or duplicates, spreadsheets, lists, reports, documents, notes, correspondence, photographs, investigative information or other documents which pertain in any way to the controversy, parties or witnesses in this matter.

JURY DEMAND & TRIAL COUNSEL DESIGNATION

Plaintiff hereby demands a trial by jury. Toni L. Telles, Esquire of the Law Office of Eric A. Shore is hereby designated trial counsel.

THE LAW OFFICES OF ERIC A. SHORE

By:



TONI L. TELLES, ESQUIRE

Date: January 26, 2018

RULE 4:5-1 CERIFICATION

I, Toni L. Telles, hereby certify the following:

1. I am an attorney, licensed to practice law in the State of New Jersey and am responsible for the above-captioned matter.
2. To the best of my knowledge and belief, this matter in controversy is not the subject of any other action pending in any Court or of a pending arbitration proceeding, nor is any such proceeding contemplated at this time.
3. I hereby certify the foregoing statements made by me are true and correct to the best of my knowledge, information and belief. I am aware if any of the foregoing is willfully false, I am subject to punishment.

THE LAW OFFICES OF ERIC A. SHORE

By: 
TONI L. TELLES, ESQUIRE

Date: January 26, 2018

EXHIBIT B



P213086

ADAM WILLIAMS
PLAINTIFF
- vs -
TESLA, INC.; ET AL
DEFENDANT

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION BURLINGTON COUNTY
Docket No. BUR-L-194-18

Person to be Served

TESLA, INC.
C/O THE CORPORATION TRUST COMPANY, REGISTERED AGENT 820 BEAR
TAVERN ROAD
WEST TRENTON, NJ 08628

AFFIDAVIT OF SERVICE
(For Use By Private Service)

Papers Served: SUMMONS AND COMPLAINT, LETTER, JURY DEMAND, NOTICE OF ANTI-
SPOILIATION/PRESERVATION WARNING, CCIS, INITIAL INTERROGATORIES, DEMAND TO PRESERVE EVIDENCE,
TRIAL COUNSEL DESIGNATION, CERT., TAN, INITIAL REQUEST FOR PRODUCTION OF DOCUMENTS

Service Data:

Served Successfully X Not Served _____ Date: 02/21/2018 Time: 10:29AM Attempts: _____

____ Delivered a copy to him/her personally

Name of person served and relationship / title:

SCOTT KUNTZ

____ Left a copy with a competent household
member of over 14 years of age residing
therein.

INTAKE SPECIALIST

X Left a copy with a person authorized to
accept service, e.g. managing agent,
registered agent, etc.

Description of Person Accepting Service:

SEX: MALE COLOR: WHITE HAIR: BLACK
OTHER:

APP.AGE: 44 APP. HT: 5'9" APP. WT: 220

Comments Or Remarks:

I, JOHN JONES, was at the time of service a
competent adult not having a direct interest in
the litigation. I declare under penalty of
perjury that the foregoing is true and correct.

Sworn to before me this
23 day of Feb, 2018

Kendra M. Wolsky

Signature of Process Server Date

Client File Number: 17-181399

KENDRA M. WOLSKY
NOTARY PUBLIC OF NEW JERSEY
Comm. # 2453882
My Commission Expires 11/05/2020

NJLS Process Service
2333 U.S. Hwy 22 West
Union, NJ 07083
908-686-7300



P213085

ADAM WILLIAMS
PLAINTIFF
- vs -
TESLA, INC.; ET AL
DEFENDANT

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION BURLINGTON COUNTY
Docket No. BUR-L-194-18

Person to be Served

TESLA MOTORS, INC.
C/O THE CORPORATION TRUST COMPANY, REGISTERED AGENT 820 BEAR
TAVERN ROAD
WEST TRENTON, NJ 08628

AFFIDAVIT OF SERVICE
(For Use By Private Service)

Papers Served: SUMMONS AND COMPLAINT, LETTER, JURY DEMAND, NOTICE OF ANTI-
SPOILIATION/PRESERVATION WARNING, CCIS, INITIAL INTERROGATORIES, DEMAND TO PRESERVE EVIDENCE,
TRIAL COUNSEL DESIGNATION, CERT., TAN, INITIAL REQUEST FOR PRODUCTION OF DOCUMENTS

Service Data:

Served Successfully X Not Served _____ Date: 02/21/2018 Time: 10:29AM Attempts: _____

____ Delivered a copy to him/her personally Name of person served and relationship / title:

SCOTT KUNTZ

____ Left a copy with a competent household
member of over 14 years of age residing
therein.

INTAKE SPECIALIST

X Left a copy with a person authorized to
accept service, e.g. managing agent,
registered agent, etc.

Description of Person Accepting Service:

SEX: MALE COLOR: WHITE HAIR: BLACK APP.AGE: 44 APP. HT: 5'9" APP. WT: 220
OTHER:

Comments Or Remarks:

Sworn to before me this
23 day of Feb, 2018

Kendra M. Wolsky

KENDRA M. WOLSKY
NOTARY PUBLIC OF NEW JERSEY
Comm. # 2453882
My Commission Expires 11/05/2020

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competent adult not having a direct interest in
the litigation. I declare under penalty of
perjury that the foregoing is true and correct.

Signature of Process Server Date

Client File Number: 17-181399

NJLS Process Service
2333 U.S. Hwy 22 West
Union, NJ 07083
908-686-7300



P213084

ADAM WILLIAMS
PLAINTIFF
- vs -
TESLA, INC.; ET AL
DEFENDANT

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION BURLINGTON COUNTY
Docket No. BUR-L-194-18

Person to be Served

TESLA INC. D/B/A TESLA MOTORS, INC.
C/O THE CORPORATION TRUST COMPANY, REGISTERED AGENT 820 BEAR
TAVERN ROAD
WEST TRENTON, NJ 08628

AFFIDAVIT OF SERVICE
(For Use By Private Service)

Papers Served: SUMMONS AND COMPLAINT, LETTER, JURY DEMAND, NOTICE OF ANTI-SPOILIATION/PRESERVATION WARNING, CCIS, INITIAL INTERROGATORIES, DEMAND TO PRESERVE EVIDENCE, TRIAL COUNSEL DESIGNATION, CERT., TAN, INITIAL REQUEST FOR PRODUCTION OF DOCUMENTS

Service Data:

Served Successfully ☒ Not Served _____ Date: 02/21/2018 Time: 10:29AM Attempts: _____

_____ Delivered a copy to him/her personally Name of person served and relationship / title:

SCOTT KUNTZ

_____ Left a copy with a competent household member of over 14 years of age residing therein.

INTAKE SPECIALIST

☒ Left a copy with a person authorized to accept service, e.g. managing agent, registered agent, etc.

Description of Person Accepting Service:

SEX: MALE COLOR: WHITE HAIR: BLACK
OTHER:

APP. AGE: 44 APP. HT: 5'9" APP. WT: 220

Comments Or Remarks:

I, JOHN JONES, was at the time of service a competent adult not having a direct interest in the litigation. I declare under penalty of perjury that the foregoing is true and correct.

Sworn to before me this
23 day of Feb, 2018

Kendra Wolsky

KENDRA M. WOLSKY
NOTARY PUBLIC OF NEW JERSEY
Comm. # 2453882
My Commission Expires 11/05/2020

Signature of Process Server Date

Client File Number: 17-181399

NJLS Process Service
2333 U.S. Hwy 22 West
Union, NJ 07083
908-686-7300

EXHIBIT C

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Adam Williams,

Plaintiff,

vs.

Tesla, Inc.; Tesla Motor, Inc.; Tesla, Inc. d/b/a
Tesla Motors, Inc.; and John Does 1-5 and 6-10,

Defendants.

Case No. _____

DECLARATION OF JESSIE BRIEL

I, Jessie Briel, make the following statement under penalty of perjury:

1. I am a Senior Human Resources Partner for Tesla, Inc. and have been in an employee at Tesla, Inc. since April 2016.
2. Tesla, Inc. is incorporated in the State of Delaware.
3. Tesla, Inc.'s principal place of business is Palo Alto, California. From Palo Alto, Tesla, Inc.'s officers direct, control, and coordinate Tesla, Inc.'s activities.
4. Tesla Motors, Inc. underwent a corporate name change and is now Tesla, Inc.
5. When in operation, Tesla Motor, Inc. was incorporated in the State of Delaware, and its principal place of business was Palo Alto, California.
6. Tesla, Inc. does not do business as Tesla Motors, Inc.
7. Plaintiff Adam Williams worked and resided in New Jersey throughout his employment with Tesla, Inc.

(continued on next page)

8. At the time of his termination October 18, 2017, Plaintiff's annual salary was \$120,000.00.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed this 22nd day of March, 2018, at New York, New York.

A handwritten signature in black ink, appearing to read 'JBriel', is positioned above a horizontal line.

Jessie Briel

EXHIBIT D

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

Adam Williams,

Plaintiff,

vs.

Tesla, Inc.; Tesla Motor, Inc.; Tesla, Inc. d/b/a
Tesla Motors, Inc.; and John Does 1-5 and 6-10,

Defendants.

Case No. _____

DECLARATION OF JEANNINE
LINNANE

I, Jeannine Linnane, make the following statement under penalty of perjury:

1. I am an Assistant Librarian for Littler Mendelson, P.C. and have been in that position for 3 years.

2. At the request of counsel for Tesla, Inc., I ran a Finder Report for the address of Plaintiff Adam Williams ("Plaintiff") on LexisNexis, Accurint for Legal Professionals, the results of which are redacted and attached hereto as Exhibit 1.

3. The results of the Finder Report show that Plaintiff's address from November 2008 to the present is in Lumberton, New Jersey.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed this 23 day of March, 2018, at 10:17 a.m.

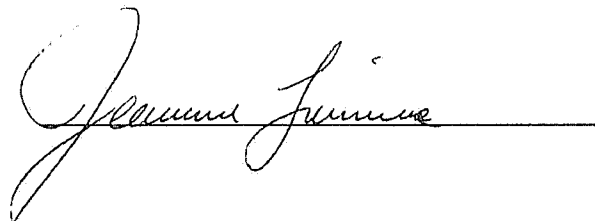
A handwritten signature in cursive script, reading "Jeannine Linnane", is written over a horizontal line.

EXHIBIT 1

Important: The Public Records and commercially available data sources used on reports have errors. Data is sometimes entered poorly, processed incorrectly and is generally not free from defect. This system should not be relied upon as definitively accurate. Before relying on any data this system supplies, it should be independently verified. For Secretary of State documents, the following data is for information purposes only and is not an official record. Certified copies may be obtained from that individual state's Department of State. The criminal record data in this product or service may include records that have been expunged, sealed, or otherwise have become inaccessible to the public since the date on which the data was last updated or collected.

Accurant does not constitute a "consumer report" as that term is defined in the federal Fair Credit Reporting Act, 15 USC 1681 et seq. (FCRA). Accordingly, Accurant may not be used in whole or in part as a factor in determining eligibility for credit, insurance, employment or another permissible purpose under the FCRA.

Your DPPA Permissible Use: Civil, Criminal, Administrative, or Arbitral Proceedings

Your GLBA Permissible Use: Use by Persons Holding a Legal or Beneficial Interest Relating to the Consumer

Your DMF Permissible Use: Legitimate Business Purpose Pursuant to a Law, Government Rule, Regulation, or Fiduciary Duty

Finder Report

Date: 03/19/18

Reference Code: [REDACTED]

Subject Information

(Best Information for Subject)

Name: ADAM KEITH WILLIAMS

Date of Birth: [REDACTED]

Age: [REDACTED]

SSN: [REDACTED] issued in New Jersey between [REDACTED] and [REDACTED]

Others Associated with SSN:

(DOES NOT usually indicate any type of fraud or deception)

DOB: [REDACTED] **Age:** [REDACTED]

Age: [REDACTED]

AKAs

(Names Associated with Subject)

ADAM WILLIAMS

DOB: [REDACTED] **Age:** [REDACTED] **SSN:** [REDACTED]

ADAM K WILLIAMS

DOB: [REDACTED] **Age:** [REDACTED] **SSN:** [REDACTED]

ADAN K WILLIAMS

DOB: [REDACTED] **Age:** [REDACTED] **SSN:** [REDACTED]

Indicators

Bankruptcy: Yes

Property: Yes

Corporate Affiliations: No

Address Summary (✓ - Probable Current Address)

✓ [REDACTED], LUMBERTON, NJ 08048-3403, BURLINGTON COUNTY (Nov 2008 - Mar 2018)

Phone at address: [REDACTED]

[REDACTED], LUMBERTON, NJ 08048-3032, BURLINGTON COUNTY (Nov 2008 - Feb 2018)

[REDACTED], LUMBERTON, NJ 08048-5073, BURLINGTON COUNTY (May 2002 - Feb 2014)

Phone at address: [REDACTED]

[REDACTED], BERLIN, NJ 08009-1127, CAMDEN COUNTY (Feb 1987 - Oct 2012)

[REDACTED], MOUNT HOLLY, NJ 08060-5073, BURLINGTON COUNTY (2002 - Feb 2003)

[REDACTED], WILLIAMSTOWN, NJ 08094-8636, GLOUCESTER COUNTY (Nov 1995 - Jan 2003)

Phone at address: [REDACTED]

[REDACTED], SICKLERVILLE, NJ 08081-4203, CAMDEN COUNTY (Jun 1986 - Jan 2003)

[REDACTED], WESTAMPTON, NJ 08060-2440, BURLINGTON COUNTY (Jan 2002 - Aug 2002)

[REDACTED], BERLIN, NJ 08009-2209, CAMDEN COUNTY (Feb 2002)

[REDACTED], STOWE, VT 05672-4277, LAMOILLE COUNTY (Aug 1991 - Mar 1999)

Phone at address: [REDACTED]

[REDACTED], WILLIAMSTOWN, NJ 08094-2837, GLOUCESTER COUNTY (Feb 1996)

[REDACTED], STOWE, VT 05672-4277, LAMOILLE COUNTY (Dec 1992 - Mar 1993)

Phone at address: [REDACTED]

[REDACTED], MONROE TOWNSHIP, NJ 08831, MIDDLESEX COUNTY (Jun 1986)

[REDACTED], MOORESTOWN, NJ 08057-3413, BURLINGTON COUNTY

Phone Summary

Phones at Address:

Previous Phones:

1st Degree Relatives Phones:

Neighbor Phones:

Previous Phone Numbers

Phone: [REDACTED]
City/State: LUMBERTON, NJ

Phone: [REDACTED]
City/State: WILLIAMSTOWN, NJ

Phone: [REDACTED]
City/State: BERLIN, NJ

**1st Degree Relatives
Phones**

[REDACTED] WILLIAMS - DOB: [REDACTED]
LUMBERTON, NJ 08048-3403
Phone at [REDACTED]
address: WILLIAMS ADAM

[REDACTED] WILLIAMS -
DOB: [REDACTED]

Dates: Mar 2002 - 2012
Type: LANDLINE

Dates: Apr 1994 - 2001
Type: LANDLINE

Dates: Feb 1987 - Mar 2002
Type: LANDLINE

2nd Degree Relatives Phones

[No Data Available]

[REDACTED]
LUMBERTON, NJ 08048-3403
Phone at [REDACTED]
address: WILLIAMS ADAM

Neighbor Phones

Neighborhood #1:

[REDACTED], LUMBERTON, NJ 08048-3403
[REDACTED], LUMBERTON, NJ 08048-3404
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3403
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3403
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3404
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3404
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3403
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3404
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3403
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3404
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3403
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3404
Phone at address: [REDACTED]

Neighborhood #2:

[REDACTED], LUMBERTON, NJ 08048-3032
[REDACTED], LUMBERTON, NJ 08048-3032
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3084
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3082
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3084
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3082
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3082
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3032
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3084
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3082
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3082
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-3032
Phone at address: [REDACTED]

Neighborhood #3:

[REDACTED], LUMBERTON, NJ 08048-5073
[REDACTED], LUMBERTON, NJ 08048-5073
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-5074
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-5073
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-5074
Phone at address: [REDACTED]
[REDACTED], LUMBERTON, NJ 08048-5074
Phone at address: [REDACTED]

Neighborhood #4:

[REDACTED], BERLIN, NJ 08009-1127
[REDACTED], BERLIN, NJ 08009-1126
Phone at address: [REDACTED]
[REDACTED], BERLIN, NJ 08009-1126
Phone at address: [REDACTED]
[REDACTED], BERLIN, NJ 08009-1126
Phone at address: [REDACTED]
[REDACTED], BERLIN, NJ 08009-1126

Possible Associates Phones

[No Data Available]

Phone at address: [REDACTED]
[REDACTED], BERLIN, NJ 08009-1127
Phone at address: [REDACTED]
[REDACTED], BERLIN, NJ 08009-1126
Phone at address: [REDACTED]
[REDACTED], BERLIN, NJ 08009-1126
Phone at address: [REDACTED]

Neighborhood #5:
[REDACTED], WILLIAMSTOWN, NJ 08094-8636
[REDACTED], WILLIAMSTOWN, NJ 08094-2837
Phone at address: [REDACTED]
[REDACTED], WILLIAMSTOWN, NJ 08094-8636
Phone at address: [REDACTED]
[REDACTED], WILLIAMSTOWN, NJ 08094-8636
Phone at address: [REDACTED]
[REDACTED], WILLIAMSTOWN, NJ 08094-2837
Phone at address: [REDACTED]
[REDACTED], WILLIAMSTOWN, NJ 08094-8636
Phone at address: [REDACTED]
[REDACTED], WILLIAMSTOWN, NJ 08094-2837
Phone at address: [REDACTED]
[REDACTED], WILLIAMSTOWN, NJ 08094-2837
Phone at address: [REDACTED]

Bankruptcy Filings

Date Filed: [REDACTED] Chapter: [REDACTED] Disposition Date: [REDACTED] Disposition: [REDACTED]
Case Number: [REDACTED] Filing Status: [REDACTED] Court Location: [REDACTED]

Corporate Affiliations

[No Data Available]

People at Work

This content was not included in your report but is available for an additional cost by clicking the button below:

[Purchase Selection\(s\)](#) OR [Upgrade to Comprehensive Report](#)

Drivers License

This content was not included in your report but is available for an additional cost by clicking the button below:

[Purchase Selection\(s\)](#) OR [Upgrade to Comprehensive Report](#)

Phones Plus

This content was not included in your report but is available for an additional cost by clicking the button below:

[Purchase Selection\(s\)](#) OR [Upgrade to Comprehensive Report](#)

EXHIBIT E

BURLINGTON COUNTY
SUPERIOR COURT
49 RANCOCAS ROAD
MT HOLLY NJ 08060

TRACK ASSIGNMENT NOTICE

COURT TELEPHONE NO. (609) 288-9500
COURT HOURS 8:30 AM - 4:30 PM

DATE: JANUARY 26, 2018
RE: WILLIAMS ADAM VS TESLA, INC.
DOCKET: BUR L -000194 18

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 3.

DISCOVERY IS 450 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS
FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRETRIAL JUDGE ASSIGNED IS: HON JOHN E. HARRINGTON

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 002
AT: (609) 288-9500.

IF YOU BELIEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A
CERTIFICATION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE
WITH R.4:5A-2.

ATTENTION:

ATT: TONI TELLES
ERIC A. SHORE, PC
201 LAUREL RD 8TH FL
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Dennis J. Gruenke Δ +
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**Reply to Voorhees Office*

January 26, 2018

Toni L. Telles, Esquire

Direct Dial 856-433-6228

Direct Dial 856-433-6230 - Telefax
tonit@ericshore.com

VIA E-COURTS FILING

Direct Filing/ Law Division
Burlington County Superior Court
49 Rancocas Road
Mount Holly, New Jersey 08060

Re: Adam Williams v Tesla, Inc.; Tesla Motors, Inc.; Tesla, Inc. d/b/a Tesla Motors, Inc.
Our File Number: 17-181399

Dear Sir/ Madam:

On behalf of the Plaintiff, Adam Williams, we enclose for filing the following documents:

1. Civil Case Information Sheet
2. Complaint with Jury Demand

Kindly file these documents, charging the applicable filing fee to this Law Firm's Account Number 147515.

Thank you kindly, and please be guided accordingly.

THE LAW OFFICES OF ERIC A. SHORE

By:



TONI L. TELLES, ESQUIRE

cc: *with copy of enclosures via*
First Class Mail to:
Mr. Adam Williams

FLORIDA
201 South Biscayne Blvd, Suite 2800
Miami, FL 33131

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2 Penn Center, Suite 1240
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112 Spruce Street, Suite A
Cedarhurst, NY 11516

MARYLAND
400 East Pratt Street, Suite 800
Baltimore, MD 21202

One Gateway Center, Suite 2600
Newark, NJ 07102

Civil Case Information Statement

Case Details: BURLINGTON | Civil Part Docket# L-000194-18

Case Caption: WILLIAMS ADAM VS TESLA, INC.

Case Initiation Date: 01/26/2018

Attorney Name: TONI TELLES

Firm Name: ERIC A. SHORE, PC

Address: 201 LAUREL RD 8TH FL

VOORHEES NJ 08043

Phone:

Name of Party: PLAINTIFF : Williams, Adam

Name of Defendant's Primary Insurance Company

(if known): Unknown

Case Type: CIVIL RIGHTS

Document Type: Complaint with Jury Demand

Jury Demand: YES - 12 JURORS

Hurricane Sandy related? NO

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same

transaction or occurrence)? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? YES

If yes, is that relationship: Employer/Employee

Does the statute governing this case provide for payment of fees by the losing party? YES

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

None

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule 1:38-7(b)*




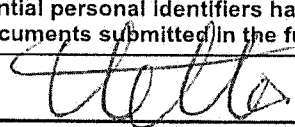
01/26/2018

Dated

/s/ TONI TELLES

Signed

Appendix XII-B1

	CIVIL CASE INFORMATION STATEMENT (CIS) Use for initial Law Division Civil Part pleadings (not motions) under <i>Rule</i> 4:5-1 Pleading will be rejected for filing, under <i>Rule</i> 1:5-6(c), if information above the black bar is not completed or attorney's signature is not affixed		FOR USE BY CLERK'S OFFICE ONLY	
			PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> CG <input type="checkbox"/> CA	
			CHG/CK NO.	
			AMOUNT:	
			OVERPAYMENT:	
		BATCH NUMBER:		
ATTORNEY / PRO SE NAME Toni L. Telles, Esquire		TELEPHONE NUMBER (856) 433-6228	COUNTY OF VENUE Burlington 	
FIRM NAME (if applicable) LAW OFFICES OF ERIC A. SHORE			DOCKET NUMBER (when available)	
OFFICE ADDRESS 4 Echelon Plaza 201 Laurel Road, 8th Floor Voorhes, New Jersey 08043			DOCUMENT TYPE Complaint	
			JURY DEMAND <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
NAME OF PARTY (e.g., John Doe, Plaintiff) Adan Williams, Plaintiff		CAPTION Adam Williams v Tesla, Inc.; Tesla Motors, Inc.; Tesla, Inc. d/b/a esla Motors, Inc.; and, John Does 1-5 and 6-10		
CASE TYPE NUMBER (See reverse side for listing) 616 - CEPA	HURRICANE SANDY RELATED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	IS THIS A PROFESSIONAL MALPRACTICE CASE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53 A -27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT.		
RELATED CASES PENDING? <input type="checkbox"/> YES <input checked="" type="checkbox"/> No		IF YES, LIST DOCKET NUMBERS Not applicable		
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> YES <input checked="" type="checkbox"/> No		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) Unknown <input type="checkbox"/> NONE <input checked="" type="checkbox"/> UNKNOWN		
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.				
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION				
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input checked="" type="checkbox"/> YES <input type="checkbox"/> No		IF YES, IS THAT RELATIONSHIP: <input checked="" type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS		
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> Yes <input type="checkbox"/> No				
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION None				
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, PLEASE IDENTIFY THE REQUESTED ACCOMMODATION		
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, FOR WHAT LANGUAGE?		
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with <i>Rule</i> 1:38-7(b).				
ATTORNEY SIGNATURE: 				

Side 2



CIVIL CASE INFORMATION STATEMENT (CIS)

Use for initial pleadings (not motions) under Rule 4:5-1

CASE TYPES (Choose one and enter number of case type in appropriate space on the reverse side.)**Track I - 150 days' discovery**

- 151 NAME CHANGE
- 175 FORFEITURE
- 302 TENANCY
- 399 REAL PROPERTY (other than Tenancy, Contract, Condemnation, Complex Commercial or Construction)
- 502 BOOK ACCOUNT (debt collection matters only)
- 505 OTHER INSURANCE CLAIM (including declaratory judgment actions)
- 506 PIP COVERAGE
- 510 UM or UIM CLAIM (coverage issues only)
- 511 ACTION ON NEGOTIABLE INSTRUMENT
- 512 LEMON LAW
- 801 SUMMARY ACTION
- 802 OPEN PUBLIC RECORDS ACT (summary action)
- 999 OTHER (briefly describe nature of action)

Track II - 300 days' discovery

- 305 CONSTRUCTION
- 509 EMPLOYMENT (other than CEPA or LAD)
- 599 CONTRACT/COMMERCIAL TRANSACTION
- 603N AUTO NEGLIGENCE - PERSONAL INJURY (non-verbal threshold)
- 603Y AUTO NEGLIGENCE - PERSONAL INJURY (verbal threshold)
- 605 PERSONAL INJURY
- 610 AUTO NEGLIGENCE - PROPERTY DAMAGE
- 621 UM or UIM CLAIM (includes bodily injury)
- 699 TORT - OTHER

Track III - 450 days' discovery

- 005 CIVIL RIGHTS
- 301 CONDEMNATION
- 602 ASSAULT AND BATTERY
- 604 MEDICAL MALPRACTICE
- 606 PRODUCT LIABILITY
- 607 PROFESSIONAL MALPRACTICE
- 608 TOXIC TORT
- 609 DEFAMATION
- 616 WHISTLEBLOWER / CONSCIENTIOUS EMPLOYEE PROTECTION ACT (CEPA) CASES
- 617 INVERSE CONDEMNATION
- 618 LAW AGAINST DISCRIMINATION (LAD) CASES

Track IV - Active Case Management by Individual Judge / 450 days' discovery

- 156 ENVIRONMENTAL/ENVIRONMENTAL COVERAGE LITIGATION
- 303 MT. LAUREL
- 508 COMPLEX COMMERCIAL
- 513 COMPLEX CONSTRUCTION
- 514 INSURANCE FRAUD
- 620 FALSE CLAIMS ACT
- 701 ACTIONS IN LIEU OF PREROGATIVE WRITS

Multicounty Litigation (Track IV)

- | | |
|--|---|
| 271 ACCUTANE/ISOTRETINOIN | 292 PELVIC MESH/BARD |
| 274 RISPERDAL/SEROQUEL/ZYPREXA | 293 DEPUY ASR HIP IMPLANT LITIGATION |
| 281 BRISTOL-MYERS SQUIBB ENVIRONMENTAL | 295 ALLODERM REGENERATIVE TISSUE MATRIX |
| 282 FOSAMAX | 296 STRYKER REJUVENATE/ABG II MODULAR HIP STEM COMPONENTS |
| 285 STRYKER TRIDENT HIP IMPLANTS | 297 MIRENA CONTRACEPTIVE DEVICE |
| 286 LEVAQUIN | 299 OLMESARTAN MEDOXOMIL MEDICATIONS/BENICAR |
| 287 YAZ/YASMIN/OCELLA | 300 TALC-BASED BODY POWDERS |
| 289 REGLAN | 601 ASBESTOS |
| 290 POMPTON LAKES ENVIRONMENTAL LITIGATION | 623 PROPECIA |
| 291 PELVIC MESH/GYNECARE | 624 STRYKER LFIT CoCr V40 FEMORAL HEADS |

If you believe this case requires a track other than that provided above, please indicate the reason on Side 1, in the space under "Case Characteristics."

Please check off each applicable category ☐ Putative Class Action ☐ Title 59